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June 19, 2019

Dov Michael Mittelman
Yaakov Saks
Stein Saks, PLLC
285 Passaic Street
Hackensack, NJ 07601
mittelmandov@yahoo.com
ysaks@SteinSaksLegal.com
(via First Class Mail, with a
copy by email)

Re: Traynor v. The Hereafter, Inc 1:19-cv-03021-GBD

Dear Mr. Mittelman,

Please find enclosed a copy of our proposed Motion for Sanctions under Fed. R. Civ. Pro. 11.

Please note that, pursuant to Fed. R. Civ. Pro. 11 (c)(2) and Rule 5(b)(1) and (b)(2)(C), as of the mailing date of this letter (June 19, 2019), the 21 day period for you to withdraw or correct the Complaint has begun. If, after this time period (the “Safe Harbor”), the Complaint has not been corrected or withdrawn, we will have the right to file the motion in court.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Sabety".

Ted Sabety.

CERTIFICATE OF SERVICE

Defendant The Hereafter, Inc. d/b/a Areaware, Inc. hereby certifies that a copy of this MOTION FOR SANCTIONS under Rule 11 has been served upon attorney for Yaseen Traynor, on this 19th day of June, 2019, by First Class U.S. Mail, postage prepaid, at the following address:

Dov Michael Mittelman
Yaakov Saks
Stein Saks, PLLC
285 Passaic Street
Hackensack, NJ 07601

Attorneys for Plaintiff



Ted Sabety

mheller@sabety.net

From: mheller@sabety.net
Sent: Wednesday, June 19, 2019 3:39 PM
To: 'mittelmandov@yahoo.com'
Cc: 'ted@sabety.net'
Subject: Traynor v. The Hereafter Inc. d/b/a Areaware Inc., Case No. 19cv3021 --- Rule 11 Motion
Attachments: Rule 11.zip

Mr. Mittleman:

Please see the attached Rule 11 Motion. A copy has been sent via First Class Mail, as well.

Melissa Heller



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mheller@sabety.net

From: Mail Delivery Subsystem <MAILER-DAEMON@rs160.luxsci.com>
Sent: Wednesday, June 19, 2019 3:39 PM
To: mheller@sabety.net
Subject: Return receipt
Attachments: details.txt; Untitled attachment 00182.txt

The original message was received at Wed, 19 Jun 2019 14:38:15 -0500 from host-135-84-167-205.essensys.tech [135.84.167.205] (may be forged)

----- The following addresses had successful delivery notifications ----- <mittelmandov@yahoo.com> (relayed to non-DSN-aware mailer)

----- Transcript of session follows ----- <mittelmandov@yahoo.com>... relayed; expect no further notifications